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January 3, 2025

Via Certified Mail No: 9407 1112 0620 6853 7600 00

Honorable Nancy J. Koppe
United States District Court District of Nevada
333 Las Vegas Blvd South
Las Vegas, NV 89101
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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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Re: Kerlus v. Corneal et al – Case No. 2:24-cv-02352-NJK

Honorable Nancy J. Koppe:

On December 17, 2024, Wolfgang Mueller filed a civil complaint in the United States District Court for the District of Nevada on behalf of my client, Kristina Kerlus. My client Kristina Kerlus learned of this filing after the publication of news reports about the filing. This filing was done without Ms. Kerlus' knowledge or consent. Mr. Mueller himself confirmed that at no time did a signed attorney-client agreement exist between his law firm and Ms. Kerlus. Further, at no time did Ms. Kerlus consent in writing or orally to have a complaint filed on her behalf. Since the filing of the lawsuit, our office has been in contact with Mr. Mueller and his local counsel, Cory Santos and Theresa Santos, who have assured us that they will take no further action.

We now respectfully seek this Court's guidance on how best to resolve this unusual situation without causing prejudice to Ms. Kerlus. Notably, there is an arguable, although unlikely, statute of limitations that expired on December 20, 2024. We respectfully request that this Court issue a ruling clarifying that no statute of limitations currently applies, given that Ms. Kerlus' criminal charges have not been dismissed with prejudice, and the prosecutor retains the authority to refile those charges at any time. Such a ruling would enable our firm to withdraw Mr. Mueller's unauthorized complaint rather than being forced to amend or adopt it.

Furthermore, we seek the Court's guidance on the appropriate procedure for withdrawing Mr. Mueller's complaint in a manner that minimizes any prejudice to Ms. Kerlus and for any other guidance the Court may have to offer.

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Sincerely,
ROMANUCCI & BLANDIN, LLC

/s/ Patrick J. Driscoll
Attorney

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